

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO. 1:05-cv-10606-REK

SHERYL SATTERTHWAITE, as Executrix)
of the Estate of DENNIS SATTERTHWAITE,)
Plaintiff)
vs.)
UNITED STATES OF AMERICA,)
UHS OF WESTWOOD PEMBROKE, INC.,)
ARTHUR PAPAS, and,)
CATHERINE SULLIVAN, R.N.C.,)
Defendants)

DEFENDANT UHS OF WESTWOOD PEMBROKE, INC.'S INITIAL DISCLOSURES

Pursuant to Fed. R. Civ. P. 26(a)(1) and United States District Court Local Rule 26.2 (A),
the Defendant, UHS of Westwood Pembroke, Inc., makes the following initial disclosures.

A. Individuals likely to have discoverable information

1. Sheryl Satterthwaite
2. Arthur Papas, M.D.
3. Catherine Sullivan, R.N.
36 Grandfield Street
Dedham, MA 02026
4. John L. Randolph, Ed.D.
5. Sandra Baker-Morissette, Ph.D.
6. John J. Pehrson, M.D.
7. Robert Lasky
8. Norman Satterthwaite
9. Rochelle Cooper
10. Kim Desjardin
11. Maureen Malin, M.D.
12. Marc Silbret, M.D.
13. Mark Longsjø, LICSW
14. Elizabeth Condron
15. Sadie-Anne Maroon
16. Ashraf Attalla, M.D.
17. Monica Gordon

18. Judi Kramer
19. Patricia Loughman-West
20. Dennis Satterthwaite's children
21. Any health care providers involved in the care and treatment of Dennis Satterthwaite.

The Defendant reserves the right to supplement this response as discoverable information becomes available.

B. Documents in UHS of Westwood Pembroke's possession, custody, or control that may be used to support its claims or defenses

1. Mr. Satterthwaite's medical records from Westwood Lodge. A copy of these records is enclosed.

C. Computation of Damages

Not applicable.

D. Insurance agreements

UHS of Westwood Pembroke, Inc. is self-insured, with policy limits of \$1,000,000/\$3,000,000.

The Defendant reserves its right to supplement these disclosures.

/s/ Amy J. DeLisa
JANET J. BOBIT, BBO# 550152
AMY J. DeLISA, BBO# 645004
Attorneys for Defendant,
UHS of Westwood Pembroke, Inc.
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Boston, MA 02110
(617) 371-1440

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